

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**DEWEY R. BOZELLA,**

**Plaintiff,**

**v.**

**THE COUNTY OF DUTCHESS; THE  
CITY OF POUGHKEEPSIE; WILLIAM J.  
O'NEILL; AND ROBERT J. DEMATTIO**

**Defendants.**

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**No. 10 Civ. 4917 (CS)**

**PLAINTIFF'S NOTICE OF MOTION FOR RECONSIDERATION**

PLEASE TAKE NOTICE that, pursuant to Local Rule 6.3 for the United States District Courts for the Southern and Eastern Districts of New York, and upon the Memorandum of Law in Support ("Memorandum"), the accompanying Appendices, and upon all prior proceedings and papers filed herein, Plaintiff Dewey R. Bozella will move this Court before the Honorable Cathy Seibel, at the Honorable Charles L. Brieant Jr. Federal Building and United States Courthouse, 300 Quarropas Street, Courtroom 218, White Plains, New York, at a time and date convenient for the Court, for an order (1) granting Plaintiff's Motion for Reconsideration of the portion of the Court's September 30, 2011 Order denying Plaintiff's request for leave to file an Amended Complaint to cure the deficiencies identified by the Court in Plaintiff's claims in the initial Complaint against Defendants County of Dutchess and City of Poughkeepsie; (2) granting Plaintiff leave to file a proposed Amended Complaint attached as Appendix A to the Memorandum; and (3) granting such other relief as this Court may deem just and proper.

Dated: New York, New York  
October 14, 2011

Respectfully submitted,

WILMER CUTLER PICKERING  
HALE AND DORR LLP

By: /s/ Peter J. Macdonald

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